



**ASHA**  
American  
Speech-Language-Hearing  
Association

June 12, 2026

Venus Vendoures Walsh  
Department of Inspections, Appeals, and Licensing  
6200 Park Avenue, Suite 100  
Des Moines, IA 50321

RE: Licensure of Audiologists and Speech-Language Pathologists

Dear Ms. Walsh:

On behalf of the American Speech-Language-Hearing Association (ASHA), we write to express concerns regarding proposed rule 481-740.2(147), which defines initial licensure requirements and supervision of the clinical experience. We do not have concerns with the remaining provisions of the proposed rulemaking.

ASHA is the national professional, scientific, and credentialing association for 247,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 1,700 ASHA members reside in Iowa.<sup>1</sup>

The proposed rule could unintentionally create barriers for applicants seeking Iowa licensure who completed their clinical experience outside the state. As written, the rule requires that clinical experience be completed under the supervision of either an Iowa-licensed SLP or an individual holding ASHA's Certificate of Clinical Competence (CCC). This presents a significant challenge for individuals who completed their clinical training in another state, do not yet hold their CCC, and wish to transition to practice in Iowa.

A similar issue recently arose in Missouri, where the requirement for supervision by a "Missouri-licensed" SLP created substantial administrative obstacles for applicants. Missouri addressed this issue by revising the requirement to allow supervision by any "licensed SLP," regardless of the state in which the license was held.

To avoid creating comparable barriers, we respectfully recommend that the Department of Inspections, Appeals, and Licensing revise the proposed rule to remove the requirement that the clinical experience supervisor be licensed in Iowa. Instead, the rule should recognize supervision by a licensed SLP in the state where the clinical experience was completed.

Thank you for considering ASHA's comments on the proposed regulations. If you or your staff have any questions, please contact:

Susan Adams  
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American Speech-Language-Hearing Association  
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Submitted on behalf of the American Speech-Language-Hearing Association

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<sup>1</sup> American Speech-Language-Hearing Association. (2025). *Iowa* [Quick Facts].  
<https://www.asha.org/siteassets/advocacy/state-flyers/iowa-state-flyer.pdf>